

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
ABERDEEN DIVISION**

MICHAEL RUSSELL

PLAINTIFF

VERSUS

CIVIL ACTION NO. 1:20-CV-0003-SA-DAS

**CITY OF TUPELO, MISSISSIPPI,
ALLAN GILBERT, in His Individual Capacity,
and BART AGUIRRE, in his Individual Capacity,**

DEFENDANTS

**PLAINTIFF'S RESPONSE TO DEFENDANTS'
MOTION TO BIFURCATE ISSUE OF PUNITIVE DAMAGES [114]**

In response to Defendants' Motion to Bifurcate Issue of Punitive Damages [114], Plaintiff

Michael Russell agrees that the punitive damages issue should be bifurcated.

RESPECTFULLY SUBMITTED, this the 1st day of November, 2021.

MICHAEL RUSSELL, Plaintiff

By: /s/ Jim Waide

Jim Waide, MS Bar No. 6857
Ron L. Woodruff, MS Bar No. 100391
waide@waidelaw.com
WAIDE & ASSOCIATES, P.A.
332 North Spring Street
Tupelo, MS 38804-3955
Post Office Box 1357
Tupelo, MS 38802-1357
(662) 842-7324 / Telephone
(662) 842-8056 / Facsimile

ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

This will certify that undersigned counsel for Plaintiff has this day filed the above and foregoing with the Clerk of the Court, utilizing this court's ECF system, which sent notification of such filing to the following:

David D. O'Donnell, Esquire
Sidney Ray Hill, Esquire
Clayton O'Donnell, PLLC
Post Office Drawer 676
Oxford, MS 38655-0676
dodonnell@claytonodonnell.com
rhill@claytonodonnell.com
khill@claytonodonnell.com

DATED, this the 1st day of November, 2021.

/s/ Jim Waide

JIM WAIDE